



DEPARTMENT OF HEALTH & HUMAN SERVICES

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May 16, 2011

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Dear Ms. Dortch:

Re: In the Matter of *The United States Department of Health and Human Services Substance Abuse and Mental Health Services Administration Petition for Permanent Reassignment of Three Toll Free Suicide Prevention Hotline Numbers, in Toll Free Service Access Codes*, WC Docket No. 07-271

The United States Department of Health and Human Services' (HHS) Substance Abuse and Mental Health Services Administration (SAMHSA) submits this supplemental comment as part of the record of the above-referenced docket.

On May 10, 2011, the United States Court of Appeals for the Ninth Circuit issued the enclosed decision, *Veterans for Common Sense v. Shinseki*, No. 08-16728, 2011 WL 1770944, (C.A. 9(Cal.)). The decision reviewed the procedures available to veterans seeking mental health care and disability compensation within the system established by the Department of Veterans Affairs (VA). While the decision was critical of many aspects of the VA system, the dissenting opinion points out the "important safeguards" protecting veterans seeking mental health care available through the Veterans Suicide Prevention Hotline, which is the hotline operated by HHS and VA. Testimony describing the lifesaving services of the Hotline was entered into the record of the district court's decision by reference to the VA FY 2010 Performance and Accountability Report. Page 27 of the dissent refers to the hotline as an "effective tool for delivering care to veterans who are unwilling or unable to come to a clinic, or who suffer a crisis before their scheduled appointment."

HHS cannot overstate the critical role served by the network of telephone hotlines operated by HHS and VA, or the need to prevent delays to those seeking emergency assistance. Callers in crisis depend on secure access to reliable, professional resources. In order to preserve the stability of that system, and the hotlines that connect individual callers in crisis to

professional assistance, we maintain that the integrated system of hotlines (including those serving veterans and their families) will operate best if the toll-free hotline numbers remain assigned to SAMHSA for use by its grantee.

Accordingly, we respectfully request the permanent reassignment of 1-800-SUICIDE, 1-888-SUICIDE, and 1-877-SUICIDA to SAMHSA.

Sincerely,


Rina Hakimian
Senior Attorney

Enclosure